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Attorney for Defendant RUSSELL TAYLOR OTT

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA

Plaintiff,

v.

RUSSELL TAYLOR OTT,

Defendant

No. CR 17 533 EMC

**DEFENDANT RUSSELL TAYLOR
OTT'S JOINDER IN DIAZ BRIEF RE:
DEFENDANTS' RIGHT TO BE
PRESENT AT THE ENTERPRISE
EXPERTS *DAUBERT* HEARING [Dkt.
No. 1019]**

Date : May 1, 2020
Time : 1:30 p.m.
Ct rm: 5 – 17th Floor
Judge: Hon. Edward M. Chen

**TO: THE UNITED STATES ATTORNEY FOR THE NORTHERN DISTRICT
OF CALIFORNIA; ASSISTANT UNITED STATES ATTORNEYS KEVIN
BARRY AND AJAY KRISHNAMURTHY; AND TO THE CLERK OF
THE ABOVE-ENTITLED COURT:**

DEFENDANT OTT'S JOINDER IN DIAZ BRIEF [Dkt. No. 1019]

1 PLEASE TAKE NOTICE that Defendant RUSSELL TAYLOR OTT, by and through his
2 counsel of record, Robert Waggener and Marcia Morrissey, hereby joins Defendant David Diaz,
3 III's Individual Brief Re Defendant's Right To Be Present At the Enterprise Experts *Daubert*
4 Hearing. [Dkt. No. 1019] Defendant Ott has constitutional rights under the Fifth and Sixth
5 Amendments and a statutory right under Rule 43 to be present at the Enterprise Experts *Daubert*
6 hearing. Mr. Ott does not waive his right to be physically present for either the direct or the
7 cross-examinations of the proposed enterprise experts.

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10 DATED: April 24, 2020

Respectfully submitted,

11
12 /s/
13 ROBERT WAGGENER
14 Attorney for Defendant
RUSSELL TAYLOR OTT

15 /s/
16 MARCIA MORRISSEY
17 Attorney for Defendant
18 RUSSELL TAYLOR OTT
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28 DEFENDANT OTT'S JOINDER IN DIAZ BRIEF [Dkt. No. 1019]